

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL GRECCO PRODUCTIONS, INC.)	
)	Civil No. 17-cv-1843-KBF
Plaintiff,)	
)	
v.)	
)	MOTION TO REOPEN
WENN LIMITED, LLOYD RAYMOND BEINY,)	DISCOVERY
CELEBITCHY LLC and SHEKNOWS LLC,)	
)	
Defendants.)	

PLEASE TAKE NOTICE THAT, Defendant Celebitchy LLC (“Celeb”) will move the Court as soon as counsel may be heard for an order pursuant to Rule 16(b) of the Federal Rules of Civil Procedure to reopen the discovery period for the limited purpose of allowing Celeb to serve document requests on Defendants WENN Limited and Lloyd Raymond Beiny concerning their financial statuses as well as ability and intent to indemnify Celeb in this case.

Dated: January 2, 2018
New York, New York

THE LAW OFFICES OF
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